

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

PHYLLIS HORACE,)	CASE NUMBER:
)	
Plaintiff,)	3-08-cv-01019
)	
vs.)	
)	
LASALLE BANK NATIONAL)	
ASSOCIATION, AS TRUSTEE FOR)	
CERTIFICATE HOLDERS OF BEAR)	
STEARNS ASSET BACKED SECURITIES)	
I LLC, ASSET BACKED CERTIFICATES,)	
SERIES 2006-EC2; BEAR STEARNS)	
ASSET BACKED SECURITIES I LLC,)	
ASSET BACKED CERTIFICATES, SERIES)	
2006-EC2; MORTGAGE ELECTRONIC)	
REGISTRATION SYSTEMS, INC.; ENCORE)	
CREDIT CORPORATION; EMC MORTGAGE)		
COMPANY; BANK OF AMERICA, et al.,)	
)	
Defendants.)	

UNOPPOSED MOTION TO EXTEND TIME FOR FILING 26(F) REPORT

COME NOW all the Defendants who have filed an Answer in this matter¹ and file this unopposed motion to extend time set by this Court for the parties to file their Rule 26(f) report. In support thereof, the undersigned states as follows:

1. The current action was removed to this Court on or about December 29, 2008. This Court subsequently entered an order stating that the parties were to file their Rule 26(f) report by January 23, 2009.

2. Upon contacting Plaintiff's counsel to discuss the Rule 26(f) report, the undersigned was notified by Plaintiff's counsel that he believed that the report should be stayed

¹ This includes all named entities with the exception of Encore Credit Corporation.

because Plaintiff's counsel planned to file a motion to remand. The undersigned stated that if in fact a motion to remand was filed, then he would not oppose a motion to continue the time for filing the Rule 26(f) report.

3. To date, to the undersigned's knowledge, no motion to remand has been filed nor have the parties conducted their Rule 26(f) meeting.

Accordingly, the undersigned respectfully requests that this Court temporarily extend the time for the submission of the Rule 26(f) report.

Respectfully submitted this 23rd day of January, 2009.

/s/ SHAUN RAMEY
Shaun Ramey
Meaghan E. Ryan
Attorneys for Defendants

Lasalle Bank National Association, as Trustee for Certificates Holders of Bear Stearns Asset Backed Securities I LLC, Asset Backed Certificates, Series 2006-EC2; Bear Stearns Asset Backed Securities I LLC, Asset Backed Certificates, Series 2006-EC2; Mortgage Electronic Registration Systems, Inc.; EMC Mortgage Company; and Bank of America, National Association

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of January 2009, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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/s/ SHAUN RAMEY
OF COUNSEL